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18 UNITED STATES OF AMERICA

19 UNITED STATES DISTRICT COURT

20 FOR THE CENTRAL DISTRICT OF CALIFORNIA

21 UNITED STATES OF AMERICA,

22 No. ED CR 23-00131-MCS-2

23 Plaintiff,

24 v.  
25 JOINT DISCOVERY STATEMENT FOR  
DEFENDANT JASMINE DAKOTA BEVERLY

26 JI RYANG CHAE, and  
27 JASMINE DAKOTA BEVERLY,

28 Defendants.  
29  
30 TRIAL DATE: 9/26/23  
31 TRIAL TIME: 8:30 a.m.  
32 LOCATION: Courtroom of the Hon.  
33 Mark C. Scarsi, 7C

34 Plaintiff United States of America, by and through its counsel  
35 of record, the United States Attorney for the Central District of  
36 California and Assistant United States Attorney Tritia L. Yuen, and  
37 defendant Jasmine Dakota Beverly ("defendant"), by and through her  
38 counsel of record, Oliver Cleary, hereby respectfully submit a joint  
39 discovery statement for defendant Jasmine Dakota Beverly, as required  
40 by the Court's Initial Standing Order for Criminal Cases Assigned to  
41 Judge Mark C. Scarsi.

1                   **A. Status of Discovery**

2           1. On August 4, 2023, the government provided to defense  
3 counsel a draft stipulation for protective order in this matter. The  
4 government believes that a protective order is needed given the  
5 personal identifying information, reference to minor victims' family  
6 members, and cooperating witness information. On August 16, 2023,  
7 the parties conferred regarding the stipulation for protective order  
8 and expect to file the stipulation for protective order soon.

9           2. On August 4, 2023, the government produced its initial  
10 discovery to defendant, which it believes do not require a protective  
11 order, consisting of approximately 470 pages documents, including law  
12 enforcement reports, and two spreadsheets. The government  
13 anticipates producing additional discovery once a protective order is  
14 in place. On or about August 16, 2023, counsel for the government  
15 and defense met and conferred telephonically on this matter. Defense  
16 counsel indicated he was still reviewing the proposed stipulation for  
17 a protective order. If this matter proceeds to trial, and to the  
18 extent additional discoverable materials are obtained by the  
19 government, the government will produce such materials to defendant  
20 in accordance with the government's continuing discovery obligations,  
21 established law, and the Court's order.

22                   **B. Discovery Disputes**

23           3. At this time, there are no contested matters of discovery  
24 and inspection. The parties reserve the right to raise discovery  
25 issues with the Court if they arise at a later date.

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1           **C. Contemplated Motions**

2           4. At this time, the parties do not anticipate filing any  
3 pretrial motions. The parties reserve the right to file additional  
4 motions to be heard at the motion hearing date if the need arises.

5           **D. Current Trial Date**

6           5. Counsel anticipate a trial continuance, but the parties  
7 have not yet reached an agreement on a date to continue the trial.

8           **E. Contemplated Trial Length**

9           6. The parties anticipate a trial in this matter (voir dire  
10 through closing arguments) will last approximately seven to eight  
11 days).

12           Dated: August 17, 2023

Respectfully submitted,

13           E. MARTIN ESTRADA  
14           United States Attorney

15           MACK E. JENKINS  
16           Assistant United States Attorney  
17           Chief, Criminal Division

18           SEAN D. PETERSON  
19           Assistant United States Attorney  
20           Chief, Riverside Branch Office

21           \_\_\_\_\_  
22           /S/ *Tritia L. Yuen*  
23           \_\_\_\_\_  
24           TRITIA L. YUEN  
25           Assistant United States Attorney  
26           Attorneys for Plaintiff  
27           UNITED STATES OF AMERICA

28           \_\_\_\_\_  
29           /s/ *via e-mail authorization*  
30           \_\_\_\_\_  
31           OLIVER CLEARY  
32           Attorney for Defendant  
33           JASMINE DAKOTA BEVERLY